

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC.,<sup>1</sup>

Reorganized Debtor.

Chapter 11

Case No. 24-12480 (LSS)

(Jointly Administered)

**RE: D.I. 1889**

**CERTIFICATION OF COUNSEL REGARDING LITIGATION  
TRUSTEE'S MOTION TO EXTEND CLAIMS OBJECTION DEADLINE**

The undersigned hereby certifies as follows:

1. On October 15, 2025, the *Litigation Trustee's Motion to Extend Claims Objection Deadline* [D.I. 1889] (the "**Motion**") was filed with the Court.
2. Responses to the Motion were to be filed and received by counsel on or before October 30, 2025 at 4:00 p.m. (Eastern).
3. The undersigned further certifies that he has caused a review of the Court's docket in these cases and no answers or other responsive pleadings have been filed in response to the Motion. Counsel received an informal request from the Reorganized Debtors' counsel to modify the proposed form of order to include the Reorganized Debtors in the claims objection extension.
4. Attached as **Exhibit A** is a revised proposed order granting the Motion (the "**Revised Order**"), which incorporates the changes requested by counsel to the Reorganized Debtors.

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<sup>1</sup> The last four digits of Franchise Group, Inc.'s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. In addition to the foregoing Reorganized Debtor, the "Reorganized Reorganized Debtors" include certain affiliated entities, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Reorganized Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FRG/>. All motions, contested matters, and adversary proceedings that remained open as of the closing of such cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

5. Attached as **Exhibit B** is a redline comparison of the Revised Order against the form of proposed order filed with the Motion.

WHEREFORE, the Litigation Trustee respectfully requests that the Revised Order, substantially in the form attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: November 3, 2025

**RAINES FELDMAN LITTRELL LLP**

/s/ Mark W. Eckard

Thomas J. Francella, Jr. (No. 3835)

Mark W. Eckard (No. 4542)

824 North King Street, Suite 805

Wilmington, DE 19801

(302) 772-5803

[tfrancella@raineslaw.com](mailto:tfrancella@raineslaw.com)

[meckard@raineslaw.com](mailto:meckard@raineslaw.com)

- and -

Hamid R. Rafatjoo (*pro hac vice*)

4675 MacArthur Court, Suite 1550

Newport Beach, CA 92660

Telephone: (310) 440-4100

Email: [hrafatjoo@raineslaw.com](mailto:hrafatjoo@raineslaw.com)

- and -

David S. Forsh (*pro hac vice*)

1350 Avenue of the Americas, 22<sup>nd</sup> Floor

New York, NY 10019

Telephone: (917) 790-7100

Email: [dforsh@raineslaw.com](mailto:dforsh@raineslaw.com)

*Counsel to the Litigation Trustee*